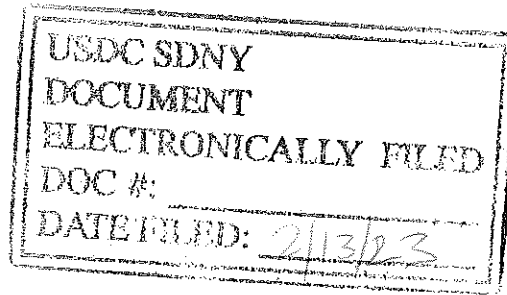


Katten

50 Rockefeller Plaza
New York, NY 10020-1605
+1.212.940.8800 tel
katten.com

SCOTT A. RESNIK
scott.resnik@katten.com
+1.212.940.8543 direct
+1.212.894.5513 fax



February 10, 2023

VIA ECF

Hon. Paul E. Davison
United States District Court
Southern District of New York
300 Quarropas Street, Rm. 420
White Plains, NY 10601-4150

Re: *United States v. Onekey, LLC, et. al.*, No. 7:22-cr-00414-PED

Dear Judge Davison:

This firm represents Defendants Onekey, LLC and Finbar O'Neill in the above-captioned case. We write to respectfully request a temporary modification of Mr. O'Neill's bail conditions to allow him to travel internationally to Cancun, Mexico from February 16, 2023 through and including February 21, 2023 for a vendor-sponsored business trip.

As the Court may recall, Judge McCarthy previously granted Mr. O'Neill's application to travel to Ireland from August 24, 2022 through and including August 31, 2022 to attend his nephew's wedding. *See* Dkt. No. 7. In addition, Your Honor granted a subsequent application for Mr. O'Neill to travel to San Jose del Cabo, Mexico from December 27, 2022 through and including January 3, 2023 for a vacation with his family. *See* Dkt. No. 17. Mr. O'Neill returned from both trips without issue and will do the same here if the Court grants this request.

We have contacted the government and pretrial services, both of whom indicated that they take no position on this application. Mr. O'Neill has already submitted the details of his travel plans to pretrial services and the government.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Scott A. Resnik".

Scott A. Resnik

APPLICATION GRANTED

A handwritten signature in black ink, appearing to read "Hon. Paul E. Davison".

Hon. Paul E. Davison, U.S.M.J.

2/13/23